

SECOND DECLARATION OF C. ALLEN GARRETT JR.

Ex. A

1 HONORABLE BENJAMIN H. SETTLE
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8 UNITED STATES DISTRICT COURT, WESTERN DISTRICT OF WASHINGTON
9 AT TACOMA
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11 DINAH CANADA, MARIE JOHNSON-
12 PEREDO and ROBERT HEWSON on behalf of
13 themselves and all others similarly situated,
14

15 Plaintiffs,

16 v.

17 MERACORD, LLC; LINDA REMSBERG and
18 CHARLES REMSBERG, individually and on
behalf of the marital community;
LLOYD E. WARD and AMANDA GLEN
WARD, individually and on behalf of the
marital community; LLOYD WARD, P.C.;
LLOYD WARD & ASSOCIATES, P.C.; THE
LLOYD WARD GROUP, P.C. (D/B/A LLOYD
WARD GROUP II); WARD HOLDINGS,
INC.; and SETTLEMENT COMPLIANCE
COMMISSION, INC.

19 Defendants.
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21 No. 12-cv-05657-BHS
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23 **PLAINTIFFS' INITIAL
24 DISCLOSURES PURSUANT TO FED.
R. CIV. P. 26(a)(1)**

25 Pursuant to Federal Rule of Civil Procedure 26(a)(1), Plaintiffs Dinah Canada, Robert
26 Hewson, and Marie Johnson-Peredo, individually and on behalf of the putative class of all those
similarly situated as described in the Amended Class Action Complaint (“Amended Complaint”)
filed on October 29, 2012, make the following Initial Disclosures. Plaintiffs set forth these Initial
Disclosures without full knowledge of all facts, claims, defenses, defendants, co-conspirators,

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 1
Case No. 12-cv-05657-BHS

1 and third parties that ultimately may be at issue in the case, and therefore, base these Initial
 2 Disclosures on the information reasonably available to Plaintiffs as of the date of service of this
 3 document.

4 Plaintiffs submit these Initial Disclosures without waiver of any applicable privilege or
 5 protection. Plaintiffs reserve the right to object to the admissibility at trial of any information
 6 contained in or derived from the Initial Disclosures. Plaintiffs further reserve the right to rely
 7 upon the individuals identified in these Initial Disclosures for subjects other than those identified
 8 herein in response to Defendants' disclosures, evidence, and testimony.

9 Plaintiffs' investigation and discovery concerning this case is ongoing, and they
 10 anticipate that further investigation, discovery, legal research, and analysis may supply additional
 11 facts and theories that may lead to the amendment and/or supplementation of these Initial
 12 Disclosures. Accordingly, Plaintiffs reserve the right to supplement these Initial Disclosures at
 13 any time in accordance with Federal Rule of Civil Procedure 26(e).

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**I. INDIVIDUALS LIKELY TO HAVE DISCOVERABLE
 15 INFORMATION THAT PLAINTIFFS MAY USE TO SUPPORT
 16 THEIR CLAIMS (FED R. CIV. P. 26(A)(1)(A)(I)).**

17 The following tables list persons who, upon information and belief, are likely to have
 18 discoverable information that Plaintiffs may use to support their claims against Defendants,
 19 along with the subjects of information. The identity and contact information for putative class
 20 members may be within the possession of Defendants and/or their third-party affiliates, and/or
 21 co-conspirators, namely the "front-end" debt settlement companies ("Front DSCs") as described
 22 in the Amended Complaint.¹ In stating the preceding two sentences, Plaintiffs do not concede

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¹ The Front DSCs include but may not be limited to: Lloyd Ward and Associates, Express Debt Settlement Holdings, Law Office of Simon & Bocksch, Freedom Debt Relief, First Rate Debt Solutions, Expert Settlement Professional, P&E Solutions, Freedom Debt Center, Accredited Financial Corporation, Amber Network Inc., Best Debt Options, Beyond Financial Service, Brite Credit Inc. (d/b/a Brite Credit 123), Century Negotiations Inc., Clear Debt Solution, Coastal Debt Solutions LLC, Consumerwise Debt Solutions Inc., Counsel 4 Debt Relief, Countrywide Debt Solutions Inc., Credit Care Corporation, CreditCare Pro, Debt Help Center USA, Debt National Relief, Debt Reinvestment, Debt Solutions, Debt Erase Inc., DebtPointer Inc., DebtPro LLC, DTS Financial Group,

1 that those putative class members should be the subject of any discovery by Defendants in this
 2 litigation.

3 Because Meracord Defendants falsely represent to customers that Meracord is completely
 4 independent from its Front DSCs, *see, e.g.*, Am. Compl. ¶¶ 3–4, 21, 46, 54, Defendants are in a
 5 better position than Plaintiffs to identify all of the specific individuals and entities involved in
 6 and/or having knowledge of the alleged conspiracy. Plaintiffs believe, however, that the various
 7 individuals listed below in Table B – who are current or former officers, employees, and agents
 8 of Defendants or the Front DSCs – possess information about the alleged conspiracy.

9 Plaintiffs further believe that various third parties may also have discoverable
 10 information. Because the litigation is in its early stages, with no discovery having occurred,
 11 Plaintiffs are presently unable to fully determine whether (and if so, which) third parties may
 12 possess discoverable information.

13 Plaintiffs further incorporate by reference here all individuals to be identified by
 14 Defendants in their Initial Disclosures, as well as any supplement to the same. Plaintiffs will
 15 supplement their Initial Disclosures should developments in their investigation and prosecution
 16 of this litigation merit such supplementation.

17 **Table A. Proposed Class Representatives**

Name	Address and Telephone Number	Subjects of Information
Dinah Canada	c/o Thomas E. Loeser Hagens Berman Sobol Shapiro LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 (206) 623-7292	Plaintiff's experience with Meracord and the Front DSC(s) (collectively, "Express Debt Front DSC") that recruited her; damages.

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 24 E.A.C. Financial LLC, FBL Associates, Freedom Debt Solutions, Help Settle LLC, Helpsettle.com, Innovative Debt
 25 Solutions, Lifeguard Financial, Maximum Debt Solutions, Morgan Stevens Financial Solutions Company, National
 26 Financial Freedom LLC, Nationwide Consumer Advocacy Group, On Track Financial LLC, Personal Debt Systems
 of America, Princeton Debt Management LLC, Reduce My Debt LLC, Settle A Debt Inc., Settlement Corporation of
 America, SilverLeaf Debt Solutions, The Debt Answer, The Debt Cure, US Consumer Report, Vision Debt.com and
 World Debt Solutions.

1	Robert Hewson	c/o Thomas E. Loeser Hagens Berman Sobol Shaprio LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 (206) 623-7292	Plaintiff's experience with Meracord and the Front DSC(s) that recruited him (collectively, "Safeguard Front DSC"); damages.
2	Marie Johnson-Peredo	c/o Thomas E. Loeser Hagens Berman Sobol Shaprio LLP 1918 Eighth Avenue, Suite 3300 Seattle, WA 98101 (206) 623-7292	Plaintiff's experience with Meracord and the Lloyd Ward Defendants (collectively, "Lloyd Ward & Associates"); damages.

Table B. Current or Former Officers, Employees, or Agents of Meracord Defendants

Name	Address and Telephone Number	Subjects of Information
Winona Bishop Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiff Hewson; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
Danielle H. Kiersztyń Secretary and General Counsel, Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord policies and procedures with respect to debt settlement; Meracord's unlawful conduct related to the debt settlement industry; document preservation.
Christine D. Pefley Meracord Director of Operations, SVP	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
Melissa A. Zaineb Meracord In-House Counsel	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord policies and procedures with respect to debt settlement; Meracord's unlawful conduct related to the debt settlement industry; document preservation.
James B. Pizi Meracord CFO	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 4
Case No. 12-cv-05657-BHS

1	Tara Reilly Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiffs; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
2	Douglas Cerna Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiff Hewson; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
3	Nikki Hollee Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiff Hewson; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
4	Tessa Naber Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiff Hewson; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
5	Linda Remsberg, CEO, Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
6	Susan Warren Employee/Agent of Meracord	c/o Pamela M. Andrews Andrews Skinner, P.S. 645 Elliot Avenue West, Suite 350 Seattle, WA. 98119-3911 (206) 223-9248	Meracord's interactions with Plaintiff Hewson; Meracord's unlawful conduct related to the debt settlement industry; damages; document preservation.
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PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 5
Case No. 12-cv-05657-BHS

Table C. Current or Former Officers, Employees, or Agents of Lloyd Ward Defendants

Name	Address and Telephone Number	Subjects of Information
Rona Favreau Employee/Agent of Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' interactions with Plaintiff; Lloyd Ward Defendants' unlawful conduct related to the debt settlement industry; damages; document preservation.
Sylvia [Last Name Unknown] Employee/Agent of Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' interactions with Plaintiff; Lloyd Ward Defendants' unlawful conduct related to the debt settlement industry; damages; document preservation.
Justin Andrews Employee/Agent of Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' interactions with Plaintiff; Lloyd Ward Defendants' unlawful conduct related to the debt settlement industry; damages; document preservation.
[Name Unknown] Employee/Agent of Lloyd Ward & Associates (identified himself as a "manager")	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' interactions with Plaintiff; Lloyd Ward Defendants' unlawful conduct related to the debt settlement industry; damages; document preservation.
Taylor Jackson Employee/Agent of Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' interactions with Plaintiff; Lloyd Ward Defendants' unlawful conduct related to the debt settlement industry; damages; document preservation.
Lloyd E. Ward Principal, Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry; damages; document preservation.

PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 6
Case No. 12-cv-05657-BHS

1	Amanda Glen Ward Director of Marketing, Lloyd Ward & Associates	c/o Jeffrey A.O. Freimund Freimund Jackson Tardif & Benedict Garratt, PLLC 711 Capitol Way South, Suite 602 Olympia, WA 98501 (360) 534-9960	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry; damages; document preservation.
4	Kevin Devoto Owner, Lloyd Ward Group PC	Not presently known to Plaintiffs	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry; damages; document preservation.
7	Lloyd Regner Owner, Lloyd Ward Group PC	Not presently known to Plaintiffs	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry.
9	Mike Miles Director, Settlement Compliance Commission Inc. / Manager, SilverLeaf Debt Solutions LLC	Not presently known to Plaintiffs	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry.
12	Chris Garrison Director, Settlement Compliance Commission Inc.	Not presently known to Plaintiffs	Lloyd Ward & Associates' unlawful conduct related to the debt settlement industry.

Table D. Current or Former Officers, Employees, or Agents of Other Front DSCs and Third Parties

16	Dan Gordon Employee/Agent of Freedom Debt Relief / Express Debt	Not presently known to Plaintiffs	Express Debt Front DSC's fraudulent conduct.
19	Jon Simon Employee/Agent of Law Office of Simon & Bocksch	Not presently known to Plaintiffs	Express Debt Front DSC's fraudulent conduct.
21	Jim Van Every Employee/Agent of Law Office of Simon & Bocksch	Not presently known to Plaintiffs	Express Debt Front DSC's fraudulent conduct.
23	Ari Dinov Employee/Agent of Express Debt	Not presently known to Plaintiffs	Express Debt Front DSC's fraudulent conduct.

1	Carl [Last Name Unknown] Employee/Agent of Debt Relief Center	cscaramuzza@drcmtg.com: 215-661-1119 888-504-2240 (contact information on Debt Relief Center flyer)	Safeguard Front DSC's fraudulent conduct.
2	Anthony [Last Name Unknown] Employee/Agent of Debt Relief Center	akim@drcmtg.com 215-661-1119 888-504-2240 (contact information on Debt Relief Center flyer)	Safeguard Front DSC's fraudulent conduct.
3	Rachel [Last Name Unknown] Employee/Agent of Debt Relief Center	Not presently known to Plaintiffs	Safeguard Front DSC's fraudulent conduct.
4	Brittany [Last Name Unknown] Employee/Agent of Debt Relief Center	Not presently known to Plaintiffs	Safeguard Front DSC's fraudulent conduct.
5	Wendy [Last Name Unknown] Employee/Agent of Debt Relief Center	Not presently known to Plaintiffs	Safeguard Front DSC's fraudulent conduct.
6	Wendy [Last Name Unknown] Employee/Agent of Debt Relief Center	Not presently known to Plaintiffs	Safeguard Front DSC's fraudulent conduct.
7	Randy Lewis Employee/Agent of Safeguard Financial and/or NoteWorld	Not presently known to Plaintiffs 215-995-2096 (cell. number given to Plaintiff Hewson by Mr. Lewis)	Safeguard Front DSC's fraudulent conduct.
8	Robert [Last Name Unknown] Employee/Agent of Safeguard Financial	Not presently known to Plaintiffs	Safeguard Front DSC's fraudulent conduct.
9	Robert Walper Attorney at Fox Rothschild, LLP	Fox Rothschild, LLP 10 Sentry Parkway, Ste. 200 P.O. Box 3001 Blue Bell, PA 19422	Plaintiff Hewson's attempts to retrieve money fraudulently withdrawn from his account.
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PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 8
Case No. 12-cv-05657-BHS

1	Andrew Santana Attorney at Fox Rothschild, LLP	Fox Rothschild, LLP 10 Sentry Parkway, Ste. 200 P.O. Box 3001 Blue Bell, PA 19422	Plaintiff Hewson's attempts to retrieve money fraudulently withdrawn from his account.
3	Attorney Handforth Attorney at Fox Rothschild, LLP	Fox Rothschild, LLP 10 Sentry Parkway, Ste. 200 P.O. Box 3001 Blue Bell, PA 19422	Plaintiff Hewson's attempts to retrieve money fraudulently withdrawn from his account.
6	Alfonso Madrid Attorney	725 Bainbridge St. Suite E Philadelphia, PA 19147	Plaintiff Johnson-Peredo's attempts to retrieve money fraudulently withdrawn from her account, as well as suits against Plaintiff by Discover, and Discover's unwillingness to settle debts for less than the amount owed.

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12 **II. DOCUMENTS IN PLAINTIFFS' POSSESSION THAT THEY MAY
USE TO SUPPORT THEIR CLAIMS (FED R. CIV. P. 26(A)(1)(A)(II)).**

13 The following categories describe documents, electronically stored information, and
 14 tangible things that are in Plaintiffs' possession, custody, or control and that Plaintiffs may use to
 15 support their claims. The documents are located in Plaintiffs' residences or in the offices of
 16 Plaintiffs' counsel.

18 **A. Plaintiff Canada**

- 19 1. The electronic documents that Plaintiff received from the Express Debt Front DSC,
 20 including the EDS Client Services Agreement, NoteWorld Sign-Up Agreement, Simon &
 Bocksch Authorization to Communicate, and "application" documents.
- 21 2. Emails from Meracord to Plaintiff regarding monthly withdrawals from Plaintiff personal
 bank account; Meracord's fees and changes in fee structure.
- 22 3. Emails between Plaintiff and employees/agents of the Express Debt Front DSC regarding
 Plaintiff's concerns about lack of any settlement activity, creditor lawsuits, concerns
 about having been defrauded, and demands for the return of her money.
- 23 4. Emails between Plaintiff and Meracord regarding Plaintiff's requests to cancel her
 account and for the return of her money.

1 **B. Plaintiff Hewson**

- 2 1. The flyer from Debt Relief Center Inc. posted in Plaintiff's workplace and advertising
3 debt settlement services.
- 4 2. Emails from Meracord regarding withdrawals from Plaintiff's bank account.
- 5 3. Emails between Plaintiff and Meracord regarding Plaintiff's concerns about Meracord's
6 involvement in his debt settlement program.
- 7 4. Letter from Meracord regarding "Notice of Your Financial Privacy Rights."
- 8 5. Emails between Plaintiff and Meracord regarding logging into his online account.
- 9 6. Emails between Plaintiff and Meracord regarding his interactions with the Safeguard
10 Front DSC, as well as his requests for closure of his account and return of his money.
- 11 7. Fax from Plaintiff to SBL Associates regarding his account status and attempts to get his
12 money back from Meracord.
- 13 8. Fax from Plaintiff to Debt Relief Center regarding his interactions with the Safeguard
14 Front DSC and Meracord.
- 15 9. Printouts of Plaintiff's Meracord account history, and of his "MyPromise" online
16 account.
- 17 10. Meracord Terms & Conditions and Privacy Policy documents sent to Plaintiff.

18 **C. Plaintiff Johnson-Peredo**

- 19 1. Printouts from website of International Debt Arbitrators Association, confirming status of
20 Rona Favreau as a member, and then later as having "lapsed" certifications.
- 21 2. The initial documents Plaintiff received by mail from Lloyd Ward & Associates,
22 including a Debt Relief Package, Client Services Agreement, Meracord Sign-Up
23 Agreement, Guide to Creditor Calls, Letter from SilverLeaf, Creditor Call Logs, and
24 Limited Power of Attorney.
- 25 3. Welcome letter from Meracord sent to Plaintiff by mail.
- 26 4. Letter from Apothaker & Associates, P.C., attorneys for Plaintiff's creditor, Discover
27 Bank regarding "Notice of Debt."
- 28 5. Fax from Plaintiff to Lloyd Ward & Associates regarding letter from creditor's attorneys.
- 29 6. Letter from Lloyd Ward & Associates to Plaintiff regarding changes to her account and a
30 breakdown of relations between Lloyd Ward & Associates and SilverLeaf.
- 31 7. Letter from Meracord regarding "Notice of Your Financial Privacy Rights."
- 32 8. Meracord Terms & Conditions and Privacy Policy documents sent to Plaintiff.
- 33 9. Documents regarding two lawsuits filed by Discover Bank against Plaintiff.
- 34 10. Email from Lloyd Ward & Associates regarding closure of Plaintiff's Meracord account
35 and partial return of Plaintiff's funds.

- 1 11. Empty envelope sent from Meracord upon Plaintiff's request for a complete transaction
- 12 history of her account.
- 2 12. Letter from Plaintiff to Lloyd Ward & Associates demanding the return of all funds not
- 13 previously returned.
- 3 13. Notes by Plaintiff regarding her interactions with Defendants.
- 4 14. Printouts from Plaintiff's online "MyPromise" account with Meracord.

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6 **III. COMPUTATION OF EACH CATEGORY OF DAMAGES CLAIMED**
BY PLAINTIFF (FED R. CIV. P. 26(A)(1)(A)(III))

7 The computation of damages to the putative class members is impossible and premature
8 at this stage in the action. Plaintiff Canada suffered actual damages in the amount of \$12,473.
9 Plaintiff Hewson suffered actual damages in the amount of \$5,358.50. Plaintiff Johnson-Peredo
10 suffered actual damages in the amount of \$4,352.82. Plaintiffs bring this action pursuant to
11 Washington's debt adjusting statute (Wash. Rev. Code § 18.28), Washington's Consumer
12 Protection Act (Wash. Rev. Code § 19.86) and the Racketeering Influenced and Corrupt
13 Organizations Act ("RICO"). Under § 1964(c) of RICO, Plaintiffs and members of the class are
14 entitled to treble damages, punitive damages plus the costs associated with bringing this action,
15 including reasonable attorney's fees.

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17 **IV. INSURANCE AGREEMENT**

18 Plaintiffs do not possess any such agreement.

1 Dated: November 12, 2012
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3 **HAGENS BERMAN SOBOL SHAPIRO LLP**
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5 By: /s/ Thomas E. Loeser
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PLAINTIFFS' INITIAL DISCLOSURES PURSUANT
TO FED. R. CIV. P. 26(a)(1) - 12
Case No. 12-cv-05657-BHS